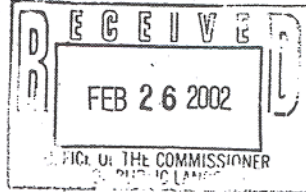


784 Olympus Blvd.
Port Ludlow, Wash. 98365
February 25, 2002



Gordon Gibbs
Washington State DNR
411 Tillicum Lane
Forks, Washington 98331

Dear Mr. Gibbs:

There is nothing in the Mats Mats Quarry Operation Environmental Impact Statement to cause me to support the request to mine to -30 feet or to -60 feet below MLLW. I strongly urge those who manage the Department of Natural Resources to adopt Alternative # 1. This was the intent of the original mining permit drafted in 1970 and it may well be that it would not have been permitted then if mining BELOW sea level was to become a future objective. No matter WHO happens to be the current owner of the quarry, the original rules and regulations must apply.

The quarry has been in operation for 68 years and it is about time to determine the original intent has been satisfied. I do not believe that through SUCCESSIVE APPROXIMATION the rules that govern this business should periodically change from the original intent of the 1970 mining permit! They should not be allowed to mine to -30 feet now and then come back in a dozen years requesting to mine to a -60 feet. Rules do not change during a sporting event and rules should not change regarding the original mining permit. Rules and regulations are codes of conduct which are necessary in an organized society. We citizens are expected to live by rules and regulations and so must this mining operation.

A basic premise I try to live by is that WE DON'T PLAY GAMES WITH PEOPLES' LIVES. Someone said to me, recently, that the mine was here before many residents. On the other hand, the beautiful surrounding waterfront properties were in existence long before the quarry began operating. We purchased our waterfront property five years ago and were told, at that time, that the quarry was about mined to sea level and the business would soon be terminated. I believe that our property values will be impacted should the quarry be allowed to operate another 25 years. This is significant in that anyone selling their property in the future would be required to disclose this negative circumstance. (We do live by rules.)

The environmental impact statement has verbal conclusions which make me uneasy!

"Would not be anticipated or none anticipated" was noted at least 21 times.

"No significant risk or impact" noted 16 times or more.

"Not expected to impact" noted 4 times.

"Potential for instability is minor" noted one time.

I am certain the words used were calculated and they certainly DO NOT enable me to have trust in what they are asking to do. Words like not expected or not anticipated are open-ended and do not address responsibility and liability for negative events and consequences that may well happen.

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Let me give an example to illustrate my concern about the above words which were used in CONCLUSIONS throughout the document. There is a well on our property which supplies water to eight separate property owners. We are all located on a peninsula of land situated between Mats Mats Bay and Admiralty Inlet. We are directly south of the quarry. The well supplies us with excellent water and it only costs each member \$30 per year to pay for the electricity to operate the pump. The impact statement indicates that it would not be anticipated that any problems will happen to wells in our area. NOTHING is declared what will happen if extended mining will cause wells to go dry or if salt water gets into the groundwater. I WANT AN ANSWER TO THE FOLLOWING TWO QUESTIONS:

1. Will the AGENCY that issues the permit be required to locate a source of good water and supply it to me well into the future and charge me \$30 per year if my well goes bad?
2. Or will the quarry be required to find and supply good water to me at \$30 per year well into the future?

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(Remember there are many wells in this area and many people involved)

Any business exists for the purpose to make money. This business is more concerned with the dollar than for the welfare of the environment or citizens of the area. The following is one example of my distrust of the quarry operation. The quarry is not in compliance at this time with terms of the original mining permit. Admitted in the environmental impact statement is a mining depth of minus 13 feet MLLW and one sentence even admits minus 15 feet. It is my opinion the current lowest depth is deeper than that. Five times over recent months I have purchased pickup loads of quarry stone and I was able to visually look across the mine. HAS ANY PUBLIC AGENCY RECENTLY BEEN THERE TO MEASURE AND VERIFY THE CURRENT DEPTH? If the response is NO --- then why not? If the quarry is not in compliance with the permit, then they are playing games with peoples' lives.

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The impact statement indicates that the property will be segregated into five acre parcels having one dwelling each when the mining operation is concluded. I really wonder if this is possible and IT SOUNDS GREAT AT THIS TIME. There will finally be 80 or 90 feet of "clean fill" deposited at the site but the Planning Department might not allow foundations and homes to be built on said fill. Also, the Health Department might not allow septic systems installed on said fill. The goal of residential lots sounds great at this time but will that goal change 25 years from

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now (successive approximation) to create a marina or some other commercial venture? I would like to see this property become a State Park or a Jefferson County Park.

The impact statement admits (no matter how large or small a degree) that there are impacts on air quality, surface water quality, marine waters, habitat for living creatures, and ground water quality. These negative consequences are cumulative and the quarry should not be permitted to continue operations by mining below sea level. A quotation used a couple times in the impact statement is, "Seawater intrusion is considered an increasing problem in the Mats Mats area."

I never see anyone harvesting the oysters near the boat launch at Mats Mats Bay. I feel certain they are contaminated and I doubt if anyone working at the quarry would be willing to eat them.

As I stated before, the impact statement document does NOT guarantee that negative results will never occur. Many lifelong experiences have taught me that if something "might" go wrong it probably will. The Department of Natural Resources should not facilitate the potential for environmental harm by allowing a -30 feet or -60 feet of mining. We should not play games with peoples' lives.

The current owners of the quarry knew, when they purchased the property, what the original mining permit stated. I doubt if it said mining could go on from 1970 until 2002 and then a new permit will be granted to mine -60 feet below sea level for another 25 years. The quarry owners knew what they were buying and should be required to operate by that original permit only. To admit to -13 feet at this time ought to be enough to terminate the mining operation.

If allowed to mine to -60 feet, it is stated that 4.8 million cubic yards of "clean soil" is needed to reclaim. I am most concerned about their meaning of "clean". Very likely it means soil having no monetary value. They state that much of this soil will need to be imported. If not available from other sources, they would bring it in from their own sites. THIS ALSO IS A CONCERN TO ME! A couple of their sites are in close proximity to the old Tacoma smelter. I DON'T WANT ARSENIC LADEN SOILS USED AS FILL. I want whatever fill that is used to be totally monitored by the Department of Natural Resources before, during, and after filling of the cavity. Polluted fill can affect neighboring wells long after the mining operation is closed down. Remember, we don't play games with peoples' lives.

Just prior to leaving office, President Clinton signed legislation to protect shorelines. Much of it pertained to reefs of Hawaii but it also involved shorelines of the mainland. We need dedicated individuals to protect our shorelines! Jefferson County is working hard to improve the quality of waters of Hood Canal and I doubt if they would issue new permits to begin new shoreline mining operations. Decisions we make today affect the

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lives of people today and consequences may extend well into the future.

I still urge the Department of Natural Resources to survey and measure the existing depth of the pit to determine if the depth is only minus 13 feet. I (and others) believe it is deeper than -13 feet and I wish DNR would verify this BEFORE making final decisions.

My property tax for 2002 is \$3,475.06. I am retired on fixed income, including social security, so this tax is no little thing for me. I am proud to pay this tax as it helps our government to operate! Conversely, I expect government to respond to basic needs, concerns, and fears of the citizens of our beautiful community. You can do this by not permitting mining at the quarry below sea level. The quality of our lives plus the survival of a beautiful seashore environment is at risk!

The quotation I have used several times in this paper was learned twenty years ago in a college class. The title of the class was: The Fundamentals of Management. The quotation again:

"We don't play games with peoples' lives."

My reason for repeating it again must be obvious!

Thank you for your attention to this matter.

Sincerely yours,

Gwinn L. Dunham

Gwinn L. Dunham

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Response to Letter 17

DUNHAM, GWINN (February 25, 2002)

1. Comment acknowledged.
2. Comment acknowledged.
3. Comment acknowledged.
4. Comment acknowledged. Please refer to Response to Letter 7 (Mats Mats Area Coalition – March 7) comment 17.
5. Although the groundwater analysis prepared for this Final EIS indicates that no impact to off-site wells would occur with proposed mining, the Groundwater Monitoring Program has been revised and updated. The Groundwater Monitoring Plan has been revised to assign oversight of Monitoring Plan implementation to the Washington State Department of Natural Resources (DNR) and Jefferson County. The final scope of the Plan would be approved by the DNR and Jefferson County during the permit review process. A qualified consultant selected by Glacier, and approved by DNR and Jefferson County, would conduct the monitoring and prepare the reports. At Glacier's expense, a qualified consultant jointly selected by DNR and Jefferson County, and approved by Glacier, would review the reports. If contingency planning becomes necessary, that consultant would also, at Glacier's expense, assist these agencies in working with Glacier to develop contingency response actions. Please refer to *Appendix I / IX* for detail on the Plan. Please also refer to Response to Letter 4 (Jefferson County), comment 1.
6. Comment acknowledged. Please refer to Response to Letter 4 (Jefferson County), comment 12 for a discussion on quarry elevations.
7. Comments acknowledged. Please refer to Response to Letter 7 (Mats Mats Area Coalition – March 7) comment 121.
8. Comment acknowledged. Please refer to the *Groundwater* section of this Final EIS for discussion on the potential for marine water intrusion impacts to area wells resulting from the *Proposed Action*.
9. Comment acknowledged. Please refer to the *Plants & Animals* section of this Final EIS for a discussion on the potential impacts to fisheries resources with continued mining operations.
10. Comment acknowledged. Please refer to Response to Letter 7 (Mats Mats Area Coalition – March 7), comment 17. Please also refer to the *Surface Water* and *Groundwater* sections of this Final EIS for the analysis of water conditions with the proposal.

11. Comment acknowledged. Please refer to Response to Letter 7 (Mats Mats Area Coalition – March 7) comment 17.
12. To ensure that only clean soil is utilized for reclamation purposes, Glacier Northwest has implemented a Clean Soil Acceptance Policy. The Clean Soil Acceptance Policy specifies that clean soil is earthen material that does not contain the following: radioactive or hazardous waste, construction or demolition waste, broken concrete or asphalt, tires or other rubber or plastic materials, garbage, rubbish, wood waste or other organic matter, or soil associated with any cleanup action. Please also refer to Response to Letter 4 (Jefferson County), comment 5.
13. Comment acknowledged.
14. Comment acknowledged.